

Jim Maggiore, Chair
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TOWN OF NORTH HAMPTON, NEW HAMPSHIRE
THE SELECT BOARD

July 14, 2017

Gregg Comstock, P.E., Supervisor
Water Quality Planning Section
Department of Environmental Services
STATE OF NEW HAMPSHIRE
29 Hazen Drive
Post Office Box 95
Concord, New Hampshire 03302-0095

RE: Hampton Rod and Gun Club
DES Number 201310001

RECEIVED

JUL 17 2017

DEPARTMENT OF
ENVIRONMENTAL SERVICES

Dear Mr. Comstock:

Pursuant to a vote of the North Hampton Select Board on July 10, 2017, I enclose for filing a copy of a review of Exeter Environmental Associates' Site Investigation Report (SIP) dated April 4, 2017. The review, prepared by GZA Geoenvironmental, Inc. on behalf of the Town, summarizes the Select Board's concerns with the SIP.

The Board would like to emphasize its significant concern with the work reported to NH DES by Exeter Environmental. Testing for lead at depths greater than two feet ignores the likeliest areas of contamination (depths less than two feet) on this site. Wetland sediments were not compared to sediment screening criteria as requested by your agency. Liming to increase the pH of the soil in wetlands, while a best management practice for outdoor ranges, is not appropriate in wetlands and, in any event, is unlikely to be effective over time.

Finally, and perhaps most importantly, there are no "clean" samples of the Little River such that the extent of downgradient impacts to the river cannot be delineated.

These technical issues suggest, to the Board, a failure on the part of the Gun Club and its expert to appreciate the dangers posed by the contamination of this site. In addition to

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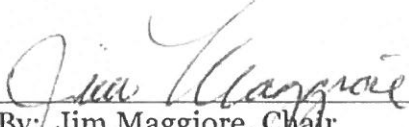
the technical issues presented by the SIP, a candid review of the record in this case reveals a substantial and indefensible delay in considering and delineating the impacts of lead contamination on this site. The Little River, and the wetlands in an around this site, form a part of the essential ecology of the Town of North Hampton and the Seacoast region. There is a demonstrated source of serious lead contamination; and yet, the initial wetlands complaint in this matter was filed in February 2013. No substantial progress has yet been made in remediation.

In short, four and half years after our Building Inspector reported to you this contamination, the lead shot that acts every day to contaminate the water and the soil continues to lay on the ground, unattended and unremediated, to the detriment of the people of this Town.

The Board requests that you consider and incorporate the concerns articulated in the GZA review into the DES response to the SIP. We also urge you, in the strongest possible terms, to devote the necessary resources to addressing water quality issues in this case in particular and to provide a timely review of the SIP with specific direction for its improvement and reformation as quickly as possible.

Respectfully,

THE NORTH HAMPTON SELECT BOARD


By: Jim Maggiore, Chair

Enclosure: GZA SIP Review
Copies: His Excellency, the Hon. Chris Sununu, Governor of New Hampshire
The Hon. Robert R. Scott, NH DES Commissioner
The Hon. Larry Miller, Vice Chair
The Hon. Kathleen Kilgore, Member
The Hon. Daniel Innis, Member of the NH Senate
The Hon. Henry Marsh, Member of NH House of Representatives
The Hon. Tamara Le, Member of NH House of Representatives
The Hon. Robert Landman, Chair, North Hampton Water Commission
Lisa Wilson, Chair, North Hampton Conservation Commission
Ronald A. Breton, P.E., GZA Senior Principal
Muriel S. Robinette, P.G., GZA, Senior Consultant
Tanya P. Justham, GZA, Project Manager
James Clemence, Sr., Hampton Rod and Gun Club